**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: DEPUY ORTHOPAEDICS, INC. PINNACLE HIP IMPLANT PRODUCTS LIABILITY LITIGATION	MDL No. 2244 Honorable Ed Kinkeade
This Document Relates To: *Andrews v. DePuy Orthopaedics, Inc., et al.* No. 3:15-cv-03484-K *Davis v. DePuy Orthopaedics, Inc., et al.* No. 3:15-cv-01767-K *Metzler v. DePuy Orthopaedics, Inc., et al.* No. 3:12-cv-02066-K *Rodriguez v. DePuy Orthopaedics, Inc., et al.* No. 3:13-cv-03938-K *Standerfer v. DePuy Orthopaedics, Inc., et al.* No. 3:14-cv-01730-K *Weiser v. DePuy Orthopaedics, Inc., et al.* No. 3:13-cv-03631-K	

PLAINTIFFS' MOTION TO QUASH DEFENDANTS' AUGUST 19, 2016, SUBPOENA SERVED ON JOHN IRVING, M.D.

Defendants served a subpoena on Dr. John Irving, a Connecticut orthopedic surgeon, on August 19, 2016. The subpoena requests production of medical records for patients who are not plaintiffs in the upcoming bellwether trial, and who do not even have cases filed in this MDL. As explained more fully in Plaintiffs' memorandum in support of their motion, the subpoena should be quashed because Defendants improperly used an order from this Court, the subpoena subjects Dr. Irving to undue burden, and because the subpoena seeks production of privileged material.

Dated: August 31, 2016

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Members of the Plaintiffs' Executive Committee conferred with counsel for Defendants regarding this matter during a telephonic status conference on August 29, 2013. Defendants oppose the motion.

/s/ Justin Presnal

CERTIFICATE OF SERVICE

I certify that the foregoing instrument was served on counsel for the Defendants by the Court's ECF system and also by electronic mail on August 31, 2016.

/s/ Justin Presnal